

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ROCIO MARTINEZ, MARGARITA</b>	)	
<b>VILLALOBOS, ALEJANDRO</b>	)	
<b>RAMIREZ, and CHRISTIAN TAPIA,</b>	)	<b>CASE NO. 13-cv-7183</b>
<b>individually and on behalf of others</b>	)	
<b>similarly situated,</b>	)	<b>Judge Virginia Kendall</b>
	)	
<b>Plaintiffs,</b>	)	<b>Magistrate Judge Michael Mason</b>
	)	
<b>v.</b>	)	
	)	
<b>VALID USA, INC., DANIEL</b>	)	
<b>KHOURI, PARAMESWARI</b>	)	
<b>VELUCHAMY, PETHINAIDU</b>	)	
<b>VELUCHAMY, and TIMOTHY</b>	)	
<b>HOOKS,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF A  
CLASS AND COLLECTIVE ACTION SETTLEMENT; CONDITIONAL  
CERTIFICATION OF SETTLEMENT CLASSES; DESIGNATION OF CLASS  
REPRESENTATIVES AND APPOINTMENT OF PLAINTIFFS' COUNSEL; AND  
APPROVAL OF THE FORM AND MANNER OF CLASS SETTLEMENT NOTICE**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs ask the Court to enter an order:

1. Preliminarily approving the class-wide Settlement Agreement negotiated by

Plaintiffs and Defendant Valid USA, Inc. ("Valid");

2. Conditionally certifying the proposed subclasses for settlement purposes only;
3. Designating Rocio Martinez, Margarita Villalobos, Alejandro Ramirez, and

Christian Tapia as Class Representatives and their attorneys as Class Counsel;

4. Approving the form and manner of class notice; and
5. Setting a date for a final fairness hearing.

6. A draft order is attached to the memorandum of law filed in support of this motion.

WHEREFORE, Plaintiffs request entry of the attached draft order or a similar order.

Respectfully submitted,

/s/ Christopher J. Wilmes

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